



July 7, 2013

Lori Koho
Administrator
Safety, Reliability & Security Division
Oregon Public Utility Commission
PO Box 1088
Salem, Oregon 97308-1088

Re: Communications Operator in Oregon - 5 Year Check in Report and Inspection Compliance Program

Dear Lori,

This letter is in response to the notification email and letter received regarding the Q-Life Network Communications Operator in Oregon - 5 Year Check in Report and 10 Year Inspection Compliance Program. Commstructure Consulting, LLC is contracted by Quality Life Networks (Q-Life) in The Dalles, Oregon and provides technical consulting services for design and project management of their fiber optic network.

Q-Life designed and constructed their fiber optic network in several phases beginning in 2003 with the final segment of backbone completed in 2005. Q-Life continues to expand the network footprint with ongoing projects consisting mainly of short laterals and connections to customers. Q-Life operates their network primarily within The Dalles city limits with some overflow into unincorporated areas of Northern Wasco County. Approximately 35 miles of the network is aerial infrastructure on Northern Wasco County PUD (NWCPUD) Joint-Use Pole Line with 3 miles of underground infrastructure. Q-Life is attached to approximately 700 Poles owned by NWCPUD which equates to 70 poles per year that will require inspection on the 10 year program. I have enclosed a map showing the network route layout for reference.

Pleading a bit of ignorance, it was our understanding that through our joint-use relationship with NWCPUD, our pole attachments would be included in the PUD's NESC inspections and Q-Life would be identified and contacted in the event of any deficiencies found. I have since spoken with Rick Carter a few months back and he clarified that all Communications Operators in Oregon are required to self-perform their inspections and develop a reporting program to be in compliance.

As a result, we understand that Q-Life is now five years into the 10 year cycle of inspections with no inspections to date resulting in the requirement for inspections of 20% of the poles (140 poles) per year for the next five years. Q-Life is contracting with Commstructure Consulting to develop and implement this accelerated 5 year inspection, correction and reporting program immediately to bring Q-Life into compliance by 2017. Q-Life will then resume a 10% inspection program according to the OPUC requirements. Commstructure is in the process of scheduling and commencing with the inspections during 3Q 2013. Q-Life will be reporting the results with corrections (as required) by year end in 2013 and subsequent year ends until completion in 2017.

Thank you very much for bringing this requirement to our attention and your patience in helping us to implement our inspections program to bring our infrastructure into compliance. If you have any questions or need additional information, please do not hesitate to contact me.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Erik Orton', is written in a cursive style.

Erik Orton - President

Planning | Design | Implementation

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